

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NICOLE L. MOORE : CHAPTER 13
: BANKRUPTCY NO. 24-12018 DJB
DEBTOR :

**DEBTOR'S OBJECTION TO THE
CERTIFICATION OF DEFAULT BY MIDFIRST BANK**

TO THE HONORABLE DEREK J BAKER, U.S. BANKRUPTCY JUDGE:

Movant/Debtor, **NICOLE L. MOORE**, by and through her attorney, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this Objection to the Certification of Default filed by MidFirst Bank, Respondent/Creditor, and in support thereof, avers as follows:

1. On May 2, 2025, Movant/Creditor MidFirst Bank, filed a Certification of Default with this Court alleging that Debtor was in arrears on their mortgage in the amount of \$3,885 per a Notice of Default issued on March 5, 2025.
2. The sole reason that Movant/Creditor filed the Certification of Default is because of the alleged arrears in the mortgage payments.
3. Debtor has made payments to Movant/Creditor since the notice of default letter in excess of the amounts alleged on the Notice of Default. Specifically, two payments have been made by Debtor to cure - \$2654.54 posted March 25, 2025 and \$3981.81 via certified check on May 5, 2025 – a copy of which has been sent to Movant/Creditor.
4. Debtor has brought her account current with her mortgage post-petition.

WHEREFORE, Debtor respectfully requests that this Court deny Creditor's request to sign the Order submitted to the Court and declare that the automatic stay is still in effect.

Respectfully submitted,
\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor